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Final

Meeting Minutes Transmittal/Approval
Unit Manager's Meeting: 300-FF-1 Operable Unit
450 Hills, Richland, Washington
June 25, 1992

FROM/APPROVAL:	N.	9. McTood Date 7-30-9-2
APPROVAL:		Date 7-30-9-7 rt G. McLeod, 300 FF-1 Unit Manager, RL (A5-19)  Date 7-30-9-7  Date 7-30-9-7
APPROVAL:	(0)	Einan, 300-FF-17 Unit Manager, EPA (B5-01)  Live of Date 7/30/92  ard Hibbard, 300-FF-1 Unit Manager, WA Department of
	Ecolo	
Meeting Minutes	are	attached. Minutes are comprised of the following:
Attachment #	<b>#1</b> –	Meeting Summary/Summary of Commitments and Agreements
Attachment #	<sup>‡</sup> 2 –	Agenda For 300-FF-1 Meeting
Attachment #	<del>/</del> 3 –	Attendance List for 300-FF-1 and 300-FF-5
Attachment #	†4 –	Action Items Status List
Attachment #	#5 <b>–</b>	300-FF-1 Work Progress
Attachment #	‡6 –	Remedial Investigation Summary Schedule
Attachment #		EPA Letter to R. G. McLeod (RL) dated 06/19/92
Attachment #	<i>†</i> 8 –	EPA Letter to R. G. McLeod (RL) dated 06/15/92
Attachment #	40 _	Approved Document Change Control Form 300-FF-1-25



PREPARED BY:

Suzanne Clarke, Kay Kimmel, GSSC (A4-35)

CONCURRENCE BY:

G. Henckel, WHC 300-FF-1 RI Coordinator (H4-55)

## Meeting Summary

## Unit Manager's Meeting: 300-FF-1 Operable Unit June 25, 1992

1. SIGNING OF THE MAY 300-FF-1 MEETING MINUTES:

Minutes were reviewed and approved with no changes.

2. ACTION ITEM UPDATE (See Attachment #4):

3FF1.33 Open No change. LC Hulstrom

3FF1.70 Closed Presented 6/25/92 (see Attachment #7).

3FF1.72 Closed Presented 6/25/92 (see Attachment #8).

3. NEW ACTION ITEMS (INITIATED June 25, 1992):

No new action items were initiated.

- 4. STATUS AND SCHEDULE OF TASKS:
  - No detailed schedule was provided since essentially there were no changes from last month.
- 5. INFORMATION ITEM

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• Change Request for boundary change was signed on 06/24/92 (see Attachment #9).

UNIT MANAGER'S MEETING AGENDA 300-FF-1 OU June 25, 1992 10:00 - 10:45 PM Room 47 450 Hills Richland, Wa

Presenter - Ron Belden

Introduction:

Status:

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**Action Items** 

Remedial Investigation

Schedule

Issues: Operable Unit Boundary change request status (300-FF-1-25)

Other Topics:

Agreements and Commitments

## ZOFF-5 and 300-FF-1 Operable Unit Manager's Meeting Official Attendance Record June 25, 1992

Please print clearly and use black ink

	PRINTED NAME	SIGNATURE	ORGANIZATION	o.u. role	TELEPHONE
••••	Suzance E. Clarke	Sugarine Ciurke	SWEC	ESSE for DEPL	679-372-0630
	RG MErad	RUNTEN	ÛĖ	UM	509-37Z-00H
	Joseph Kunx	forme the	wHC	Geophysics	509-376-402 y
	Jack Fassett ,	J.w. Fasiet	WHC	Gedphysics	519-376-4224
	RA Carlson	Raculm	wurc	300 Area	509 \$76-9027
	MA Frank	MA Frank	WHC	<b>†</b>	(509) 376-273
	H.W. Donney	H.D. Dans	WHC	ER Program office	509-376-553
	RICH MULLEN	Rich Thullen	PARAMETRIX	Ewleyy Support	266-455-255c
**** ****	Jon Spreche	Jon Spreche	Brown & aiduell	Ecology Support	(503) 244-7005
	reorge C Hanckel用.	Ma Chen litter	WHC	Condinator 300 FF5 assist	(509) 376-1994
,,1	3.E. Innis	B. S. Janes	WHC	1 1	769 e 509-376-3 <del>01</del> 3
	D. GOSWAMI	Olina .	Sielan	Cent Mgs	507/546-4301
	THICE CLINE	Oleo Con Come	Ecology	l / 1/	206 xt 438-7556
	Brian Drost	Bur Livel	USGS	EPA-Support	206-593-6510
	HA PANCEN	Darlan	WHC	Escont	
****	LISA CHETNIK TREICHEL	Lua Chelme Truchel	DOE-HO (EN-47	Program MgA	301-903-8177
****	KAY KIMMEL	Kay Kimmel	Swec	GSSC 300-FF-1	509-372-0610
7	R.D. BELDEN	Ron Belden	WHC	ASST COSS	509-372-122
	Dave Einan		·EPA		509.376.3883
	Andree De Angeles	Gugge De Crayles	PRC	EPA Support	206-624-2692 509 376-609
1	LESimpson	KRJ	WHC	Proj.Sci	509 376-109-
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## Commitments/Agreements Status List

## 300-FF-1 Operable Unit

June 25, 1992

Item No.	Action	Status
3FF1.33	Assure that proper communication channels are maintained within WHC for activities concerning the 300 Area and define what criteria are to be followed for reporting surface contamination findings to DOE and the regulators. Revise EII 2.3 to include this information. Action: LC Hulstrom	Open no change from last month
3FF1.70	Revisit the ARARs identified in the approved 300-FF-1 Phase I RI Work Plan (by the April UMM) for incorporation into the Phase I RI Draft Report. EPA, as the lead regulatory agency, should report any necessary changes or additions required by EPA or Ecology to sections 3.2 (WP-112 through WP-121) to make them applicable for the RI Draft Report. Action: D. Einan	Closed EPA and Ecology provided letter dated 6/19/92.
3FF1.72	Relating to Change Request 24 (field screening activities at 300-FF-1): D. Einan will coordinate with G. Henckel to finalize the wording and provide or resolve any comments by the April UMM. Action: D. Einan/G. Henckel	Closed EPA provided letter dated 6/15/92.

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## 300-FF-1 Work Progress

page 1 of 2

June 25, 1992

O Remedial Investigation Activities

#### TASK 1 - SOURCE INVESTIGATION

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- la Source Data Compilation Task completed
- 1b Ground Penetrating Radar Survey Task completed. Additional work scope at the work at the new "landfill" area has been completed.
- 1c Electromagnetic Survey
   Task completed.
- 1d Topographic Base Map Development Completed.
- 1e "In-Pipe" Remote Inspection Survey of the RLWS
   Survey is 80% and the remaining 6 in. line is scheduled to be surveyed
   during the week of 7/6/92.
- 1f Soil Gas Survey
   Task completed.
- 1g Non-Hazardous Source Characterization Change request approved to defer ash pit sampling.

#### TASK 2 - GEOLOGIC INVESTIGATION

## TASK 3 - SOIL INVESTIGATION

- 3a Surface Radiation Survey Task completed.
- 3b Soil Sampling and Analysis

Analytical results have been transmitted to the Environmental Data Management Center for third party validation. Validation is 80% complete.

#### TASK 4 - AIR INVESTIGATION

- 4a Air Data Compilation Completed.
- 4b Ambient Air Sampling Completed

## 300-FF-1 Work Progress page 2 of 2

### June 25, 1992

## TASK 5 - TERRESTRIAL BIOLOGICAL INVESTIGATION

- 5a Biological Survey
   5a-1 Hazardous Substances Biological Uptake Assessment
   The report is being revised.
- 5a-2 Species Survey
  The report is being revised.
- 5b Asparagus Sampling and Analysis Resampling deferred.

### TASK 6 - DATA EVALUATION

- 6a Source Data Evaluation
- 6b Geologic Data Evaluation
- 6c Soil Data Evaluation
- 6d Air Data Evaluation
- 6e Terrestrial Biological Data Evaluation
- 6f Integration of Data Evaluation Tasks

The preliminary evaluation is complete and final evaluation is being incorporated into the RI/FS reports.

#### Task 7 - VERIFICATION OF ARARS

Task complete-See Action item 3FF1.70.

#### Task 8 - BASELINE RISK ASSESSMENT

The preliminary draft risk assessment was received and revised for incorporation into the RI report.

## Task 9 - PHASE I RI REPORT

The report is on schedule. Rough drafts of Chapters 1,2, and 3 are in the process of being revised. Chapter 4 is progressing.

#### Phase 1/2 Feasibility Study

The first draft is due to Westinghouse 6/26/92.

0 Schedule

Page 1 of 1



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#### Attachment #7

June 19, 1992

Robert G. McLeod Unit Manager U.S. Department of Energy P.O. Box 550, A5-19 Richland, Washington 99352

Re: 300-FF-1 ARAR Review

Dear Mr. McLeod:

Enclosed for your use is a comprehensive list of potential applicable or relevent and appropriate requirements (ARAR's) for the 300-FF-1 operable unit. The list contains a very broad spectrum of ARAR's due to the early nature of the investigation. As we get closer to the cleanup decision, the list will be narrowed and specific sections of the ARAR's will be cited.

If you have any questions, please call me at 509-376-3883.

Sincerely,

David R. Einan Unit Manager

cc:

A. DeAngeles, PRC

G. Henckel, WHC

R. Hibbard, Ecology

#### POTENTIAL ARAR'S FOR 300-FF-1

## STATE ARAR'S

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#### 1. CHEMICAL SPECIFIC

## WAC 173-303 Dangerous Waste Regulations APPLICABLE

Chapter 173-303 WAC establishes procedures for characterizing hazardous waste as Dangerous Waste (DW) or Extremely Hazardous Waste (EHW). Additional distinction is based on Persistence, carcinogenicity, mutagenicity, teratogenicity, concentration of certain compounds, and toxicity as defined by WAC 173-303-070 to 110. Wastes excavated on sites which upon testing designates as DW or EHW must be handled under this regulation. Other sections not identified here should be considered revellent and appropriate.

## WAC 173-340 MTCA Cleanup Regulations APPLICABLE

Chapter 173-340 WAC defines specific cleanup levels for numerous contaminants and point of compliance.

## WAC 173-400 General Regulations for Air Pollution Sources APPLICABLE

Chapter 173-400 WAC establishes standards that are technically feasible and reasonably attainable for air pollution sources.

WAC 173-475 Ambient Air Quality Standards for Carbon Monoxide, Ozone, and Nitrogen Dioxide APPLICABLE

Chapter 173-475 WAC defines state wide air quality standards for carbon monoxide, ozone, and nitrogen dioxide.

WAC 173-480 Ambient Air Quality Standards and Emission Limits for Radionuclides APPLICABLE

Chapter 173-480 WAC defines maximum allowable levels for radionuclides in the ambient air.

WAC 173-490 Emission Standards and Controls for Sources Emitting Volatile Organic Compounds (VOC) APPLICABLE

Chapter 173-490 WAC establishes technically feasible and reasonable attainable standards for sources emitting VOC's.

## Soil Cleanup/Remediation at Hanford February 1992 To Be Considered

The Department of Ecology Nuclear and Mixed Waste Management Program Soil Cleanup Policy became effective February 5, 1992. The purpose of this policy is to provide a basis for consistent cleanups, remediation, and closures at the Hanford Site.

#### 2. ACTION SPECIFIC

#### RCW 18.104 Water Well Construction RELEVANT AND APPROPRIATE

This regulation establishes authority for Ecology to require the licensing of water well contractors and operators and for the regulation of water well construction.

## RCW\_70.94 Washington Clean Air Act APPLICABLE

Chapter 70.94 RCW directs the state to secure and maintain levels of air quality that will protect human health and prevent injury to plant and animal life.

## RCW 70.95 Solid Waste Management RELEVANT AND APPROPRIATE

Chapter 70.95 RCW establishes a state wide program for solid waste handling, and solid waste recovery and/or recycling which will prevent land, air, and water pollution and conserve the natural, economic and energy resource of this state.

## RCW 70.98 Nuclear Energy and Radiation RELEVANT AND APPROPRIATE

Chapter 70.98 RCW establishes a program to establish procedures for assumption and performance of certain regulatory responsibilities with respect to byproduct, source, and special nuclear materials.

## RCW 70.105 Hazardous Waste Management APPLICABLE

The purpose of Chapter 70.105 RCW is to establish a comprehensive state-wide framework for planning, regulation, control, and management of hazardous waste which will prevent land, air, and water pollution and conserve the natural, economic; and energy resources of the state.

# RCW 70.105D Hazardous Waste Cleanup, Model Toxics Control Act (MTCA) APPLICABLE

Chapter 70.105D RCW provides Ecology with the authority to investigate and conduct remedial actions upon releases of hazardous substances.

#### RCW 90.44 Regulation of Public Ground Water RELEVANT AND APPROPRIATE

This chapter gives Ecology the authority to regulate and control ground water of the state.

## RCW 90.48 Water pollution Control APPLICABLE

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Chapter 90.48 RCW provides authority to regulate discharges of any pollutant to waters of the state (including surface and ground water, direct and indirect discharges).

#### RCW 90.52 Pollution Disclosure Act RELEVANT AND APPROPRIATE

Chapter 90.52 RCW describes the authority of the state to regulate reports for any commercial or industrial discharge, other than sanitary sewage, into waters of the state.

## RCW 90.54 Water Resources Act RELEVANT AND APPROPRIATE

Chapter 90.54 RCW gives the state authority to implement water related resources programs.

# WAC 173-160 Minimum Standards for Construction and Maintenance of Wells RELEVANT AND APPROPRIATE

Well construction regulations establish minimum standards for water well construction and require the preparation of construction reports.

# WAC 173-162 Rules and Regulations Governing the Licensing of Well Contractors and Operators RELEVANT AND APPROPRIATE

Chapter 173-162 WAC establishes requirements for licensing of well drillers.

## WAC 173-216 State Waste Discharge Permit Program APPLICABLE

Chapter 173-216 WAC establishes a permit system for discharges of waste water to groundwater and surface water via municipal sewage systems.

#### WAC 173-218 Underground Injection Control Program APPLICABLE

Chapter 173-218 WAC pertains to the injection of wastes into aquifers that are used for drinking water.

### <u>WAC 173-303-670</u> <u>Incinerators</u> RELEVANT AND APPROPRIATE

If incinerators are used as a remedial technology this regulation would be applicable.

# WAC 173-304 Minimum Functional Standards for Solid Waste Handling RELEVANT AND APPROPRIATE

Chapter 173-304 WAC establishes minimum functional performance standards for the proper handling of all solid waste materials.

WAC 173-403 Implementation of Regulations for Air Contaminant Sources RELEVANT AND APPROPRIATE

Chapter 173-403 WAC establishes procedures for the implementation of regulations and rules generally applicable to control and/or prevention of the emission of air contaminants.

WAC 173-470 Ambient Air Quality Standards for Particulate Matter RELEVANT AND APPROPRIATE

Chapter 173-470 WAC establishes concentrations for particle fallout standards for all ares within the State of Washington.

WAC 173-480 Ambient Air Quality Standards and Emission Limits for Radionuclides APPLICABLE

Chapter 173-480 WAC establishes a 25 mrem/y hole body or 75 mrem/y critical organ dose to any member of the public. The point of compliance is all portions of the site.

WAC 246-221 Radiation Protection Standards APPLICABLE

Chapter 246-221 WAC establishes standards for protection against radiation hazards.

WAC 246-247 Radiation Protection -- Air Emissions APPLICABLE

Chapter 246-247 WAC establishes a 25 mrem/y hole body or 75 mrem/y critical organ dose to any member of the public. It also, requires registration of the source with Ecology.

#### LOCATION SPECIFIC

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WAC 296-62 Washington Industrial Safety and Health Act Occupational Health Standards--Safety Standards for Carcinogens RELEVANT AND APPROPRIATE

State health and safety regulations are generally similar to those espoused by the federal regulations (i.e., OSHA), and are applicable to all remedial actions involving potential human exposure to hazardous materials.

WAC 173-154 Protection of Upper Aquifer Zones RELEVANT AND APPROPRIATE

Chapter 173-154 WAC provides for protection of the upper aquifers and upper aquifer zones to avoid depletions, excessive water level declines, or reductions in water quality. State regulations for upper aquifer zones are applicable to remedial alternatives that involve treating ground water or presenting risks of ground water contamination.

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WAC 173-201 Water Quality Standards for the State of Washington APPLICABLE

Ecology classifies surface waters according to their water quality and uses of the water body. The surface waters of the Columbia River are classified as Class A.

WAC 173-220 National Pollutant Discharge Elimination System Permit Program RELEVANT AND APPROPRIATE

The purpose of this chapter is to establish a state permit program, applicable to the discharge of pollutants and other wastes and materials to surface waters of the state.

WAC 173-240 Submissions of Plans and Reports for Construction of Waste Water Facilities RELEVANT AND APPROPRIATE

Chapter 173-240 WAC regulations require that Ecology review and approve plans and for waste water treatment facilities that discharge to ground water.

WAC 173-300 Certification of Operators of Solid Waste Incinerator and Landfill Facilities RELEVANT AND APPROPRIATE

Chapter 173-300 WAC defines when certification of operators is necessary at incinerators and landfills.

WAC 173-304 Minimum Functional Standards for Solid Waste Handling APPLICABLE

Chapter 173-304 WAC regulations pertain to solid waste handling facilities (e.g., municipal landfills). They contain provisions for facility design, maintenance, and closure.

WAC 173-434 Solid Waste Incinerator Facilities RELEVANT AND APPROPRIATE

This regulation defines emission standards and design and operation of solid waste incinerator facilities.

WAC 232-12 Wildlife Classification RELEVANT AND APPROPRIATE

Chapter 232-12 WAC identifies endangered, threatened, and sensitive species of fauna.

WAC 446-50 Transport of Hazardous Materials APPLICABLE

Chapter 446-50 WAC regulations are generally analogous to the corresponding federal regulations 49 CFR. Transport regulations are applicable to any off-site transportation of hazardous materials.

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#### 4. CHEMICAL SPECIFIC

33 U.S.C. 1251 Clean Water Act APPLICABLE

40 CFR 131 Water Quality\_Standards APPLICABLE

42 U.S.C. 300 (f), 40 CFR 141 Safe Drinking Water Act APPLICABLE

MCL's proposed under this rule should be included as TBC's.

40 CFR 264 Subpart F Concentration Limits TO BE CONSIDERED

40 CFR 264.521 Corrective Action at Solid Waste Management Units TO BE CONSIDERED

40 CFR 141.13 Maximum Contaminant Levels for Turbidity RELEVANT AND APPROPRIATE

40 CFR 141.3 Secondary Maximum Contaminant Levels for Drinking Water RELEVANT AND APPROPRIATE

EPA Directive 9355-.4-01FS 1990 Guide on Remedial Actions at Superfund Sites with PCB Contamination TO BE CONSIDERED

Richland City Ordinance 35-84 Public Owned Treatment Works TO BE CONSIDERED

#### ACTION SPECIFIC

42 U.S.C. 6901 Resource Conservation and Recovery Act APPLICABLE

29 CFR 1910 Occupational Safety and Health Act APPLICABLE

40 CFR 122 Discharge of Treated Effluent APPLICABLE

40 CFR 141.13 Maximum Contaminant Levels for Turbidity RELEVANT AND APPROPRIATE

40 CFR 261

40 CFR 262 Standards for Generators of Hazardous Waste APPLICABLE

40 CFR 263

40 CFR 264 Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities APPLICABLE

40 CFR 268.44	Land Disposal Restrictions APPLICABLE			
40 CFR 761.30	PCB's Storage and Disposal RELEVANT AND APPROPRIATE			
40 CFR 761.60 APPROPRIATE	Alternative Technology to Incineration RELEVANT AND			
40 CFR 761.70	Chemical Waste Landfill RELEVANT AND APPROPRIATE			
40 CFR 50 Air Qu	uality Standards RELEVANT AND APPROPRIATE			
40 CFR 58 Ambier	nt Air Quality Surveillance RELEVANT AND APPROPRIATE			
40 CFR 60 New So	ource Performance Standards RELEVANT AND APPROPRIATE			
40 CFR 61 National Emissions Standards for Hazardous Air Pollutants RELEVANT AND APPROPRIATE				
40 CFR 122 NPDES Permit Program RELEVANT AND APPROPRIATE				
LOCATION SPECIFIC				
16 U.S.C 461 AND APPROPRIATE	Historic Sites, Buildings, and Antiquities Act RELEVANT			
16 U.S.C. 742 APPROPRIATE	Fish and Wildlife Improvement Act RELEVANT AND			
16 U.S.C. 2901 APPROPRIATE	Fish and Wildlife Conservation Act RELEVANT AND			
167 U.S.C. 1271	Wild and Scenic Rivers Act RELEVANT AND APPROPRIATE			

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50 CFR 17 Endangered Species Act RELEVANT AND APPROPRIATE



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#### Attachment #8

June 15, 1992

Robert G. McLeod Unit Manager U.S. Department of Energy P.O. Box 550, A5-19 Richland, Washington 99352

Re: Approved Document Change #300-FF-1-24

Dear Mr. McLeod:

The purpose of this letter is to document for the record that the U.S. Environmental Protection Agency will not approve the above referenced change request, also enclosed. The effect of the change request was to delete the work plan requirement to perform field screening on radioactive samples, with the intention to compare the results with the laboratory results. It is our understanding that the lengthy procurement process was a primary reason why the field screening capabilities were not available. We do not believe that there exists sufficient justification to delete the requirement. We agree that the lack of field screening data will not have a major impact on the quality of this investigation, however an opportunity to reduce the cost of future investigations (by reducing analytical costs) has been lost.

If you have any questions, please call met at (509) 376-3883.

Sincerely,

Ďavid R. Einan Unit Manager

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Enclosure

cc: 2 G.-Henckel, WHC

R. Hibbard, Ecology

Per Action Plan for Implementation of the Hanford Consent Order and Compliance Agreement Section 9.3

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## Distribution

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# 300-FF-1 Operable Unit Managers Meeting June 25, 1992

Roger D. Freeberg Steven H. Wisness Diane Clark		Chief, DOE-RL, ERD/ERB (A5-19) Chief, Rstr. Br., DOE-RL/ERD (A5-19) TPA Proj. Mgr. (A5-15) DOE-RL (A5-55) DOE-RL (A5-15)			
Chuck Cline					
Lynn Albin		Washington Dept. of Health			
Ward Staubitz		USGS			
Audree DeAngeles					
Mel Adams		Program Mgr., WHC (L4-92)			
ADMINISTRATIVE RECORD: 300-FF-1; Care of EDMC, WHC (H4-22)					

This list has been updated. Please inform Suzanne E. Clarke (SWEC) of deletions or additions to the distribution list. (A4-35)